

FILED

MAY 26 2015

Clerk  
District of  
District Court  
At Chattanooga  
Tennessee

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF  
TENNESSEE AT WINCHESTER

TODD SCRUGGS

vs.

BEDFORD COUNTY JAIL

PETITION FOR REDRESS OF  
GRIEVANCES AND REQUEST  
FOR JURY TRIAL

4:15-CV-29

Mattice/center

Now comes Todd Scruggs, hereafter "Plaintiff", and submits this as formal complaint against the Bedford County Jail, hereafter "Defendant", located in Shelbyville, Tennessee, and requests a jury trial, in this case, based upon the following reasons.

OVERCROWDING AND INADEQUATE FACILITY.

Plaintiff is currently incarcerated at Defendants location.

Upon admission to Defendants correctional facility, Plaintiff was issued an unreasonably thin sheet of plastic, with no cushion at all, which Defendants staff referred to as a "mattress". Plaintiff was then forced to sleep on a filthy area of flooring for an indeterminate period of time.

Furthermore, Plaintiff was not issued proper hygiene items to which he could use to bathe and properly cleanse his body, which had become extremely

unclean, due to him being forced to sleep and live on an area of flooring which was not properly maintained by Defendants Staff.

Due to this deficiency, Plaintiff developed rashes and lesions of the skin; back, neck and spinal issues, which still persist and have not since subsided.

#### INADEQUATE / DENIAL OF MEDICAL

Plaintiff has made multiple attempts to have Defendant provide medical diagnosis and relief, for aforementioned medical issues, to no avail. Defendants Staff either ignores or denies Plaintiff's pleas for proper medical facilitation to the detriment of Plaintiff.

Defendant's Staff exhibits a complete disregard for human life and a healthy inhabitation for human beings.

#### UNHEALTHY LIVING CONDITIONS

Plaintiff asserts that unidentifiable dusts, molds, fungi, bacteria, viruses and rusts infest Defendant's facility and that Defendant is aware of these issues but makes no attempt to correct them.

Plaintiff is unable to ascertain exactly how detrimental his long term exposure to these infestable

conditions, has impacted him due to aforementioned denial of medical assessment and inadequate medical facility.

### DISCRIMINATION FAVORITISM AND RACISM

Plaintiff asserts that defendant regularly engages in acts of favoritism, discrimination and prejudice based solely upon race and/or ethnicity, against Plaintiff.

### INADEQUATE NUTRITION

Plaintiff asserts that defendant refuses to provide adequate sustenance to maintain healthy human brain and body function(s), sometimes less than 1,000 calories per day, to the detriment of inmates and Plaintiff.

### OTHER DEFICIENCIES

The deficiencies and harmful inadequacies at defendant's location are innumerable, and overwhelming to list, and/or Marshall, without the assistance of a legal expert or professional. Accordingly, Plaintiff humbly requests that the right to bring forward those accusations be reserved for the future.

### INDIGENT

Plaintiff asserts that he is indigent and unable

Plaintiff has included documentation to proceed "in forma pauperis".

Unfortunately, defendant wilfully refuses to issue Plaintiff's record of account, for the last six months, and Plaintiff humbly requests that this court order defendant to provide said information to Plaintiff, or the court, so that Plaintiff may move forward in this case.

Furthermore, Plaintiff humbly requests that an attorney be appointed to represent him in this case.

#### RELIEF

Due to physical pain and suffering, emotional distress, mental anguish and psychological trauma, Plaintiff is seeking relief in the amount of \$1,500,000.<sup>\*\*</sup> upon a favorable finding by a jury.

#### CONCLUSION

Wherefore, due to the foregoing reasons, Plaintiff humbly requests this court's assistance and a jury trial in this matter.

Respectfully Submitted.





NASHVILLE TN 370  
22 MAY 2015 PM 2 L

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